

STEPHEN YAGMAN (SBN 69737)
filing@yagmanlaw.net
YAGMAN + REICHMANN, LLP
333 Washington Boulevard
Venice Beach, California 90292-5152
(310) 452-3200

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

D. JACOBS,

Plaintiff,

v.

**ERIC MICHAEL GARCETTI, et
al.,**

Defendants.

2:22cv-08010-DOC(KESx)
2:24-cv-09320-DOC(KESx)

**NOTICE OF MOTION AND MOTION
TO CONSOLIDATE ACTIONS**

Date: June 2, 2025

Time: 8:30 a.m.

Place: Courtroom 10A, Santa Ana

Judge David O. Carter

D. JACOBS,

Plaintiff,

v.

KAREN BASS, et al.,

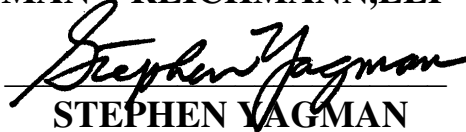
Defendants.

PLEASE TAKE NOTICE that plaintiff moves the court to consolidate for all purposes these two actions, and that oral argument will be heard as set forth above, and that the instant motion is based on the ground that these two actions are virtually identical, except that the two subject incidents occurred on different dates.

1 The L.R. 7-3 meetings occurred in the 8010 matter some time in 2023, and
2 in the 9320 matter, as a courtesy, on April 25.

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4 **YAGMAN + REICHMANN,LLP**

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STEPHEN YAGMAN

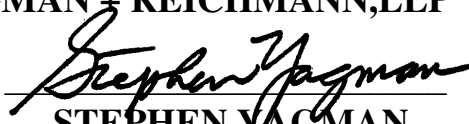
MEMORANDUM OF POINTS AND AUTHORITIES

Pursuant to Fed. R. Civ. P. Rule 42, the court should consolidate these two actions for all purposes, because they involve the same primary defendants and arise from similar incidents that occurred on different dates: the harassment of plaintiff by LAPD officers. The two "actions before the court involve a common question of law [and] fact," *ibid.*, such as to warrant consolidation.

Respectfully submitted,

YAGMAN + REICHMANN,LLP

By:


STEPHEN YAGMAN

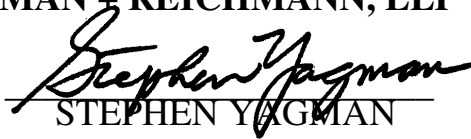
CERTIFICATE OF COMPLIANCE

(L.R. 11-6.2)

The undersigned, counsel of record for plaintiff(s) certifies that this brief contains 62 words, which complies with the word limit of L.R. 11-6.1.

YAGMAN + REICHMANN, LLP

By:


STEPHEN YAGMAN